

Mary Basile Logan  
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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEW JERSEY**

MARY BASILE LOGAN, individually and on behalf  
of those similarly situated, *Pro-Se*;

Plaintiff,

MERRICK GARLAND, in his official capacity  
Attorney General, Department of Justice;

LLOYD AUSTIN, III, in his official capacity as the  
Secretary, Department of Defense;

WILLIAM J. BURNS, in his official capacity as the  
Director, Central Intelligence Agency;

CHRISTOPHER A. WRAY, in his official capacity  
as the Director of the Federal Bureau of Investigation;

DENIS RICHARD MCDONOUGH, in his official  
capacity as Secretary of Veterans Affairs;

ALEJANDRO MAYORKAS, in his official capacity as  
Secretary, U.S. Department of Homeland Security;

MARCIA L. FUDGE, in her former capacity as Secretary  
U.S. Department of Housing and Urban Development;

ROBERT CALIFF, in his capacity as Commissioner,  
Food and Drug Administration;

WILLIAM J. CLINTON, in his official capacity as the  
former President of the United States of America;

HILLARY R. CLINTON, in her official capacity as  
former Secretary of State for the United States of America;

THOMAS KEAN, Sr., in his former capacity as Chairman  
9/11 Commission;

ROBERT MUELLER, in his former capacity as Director  
of the Federal Bureau of Investigation;

JAMES COMEY, in his former capacity as Director  
of the Federal Bureau of Investigation;

CHRISTOPHER J. CHRISTIE, in his capacity as the  
former-Governor of New Jersey;

RICHARD “DICK” CHENEY, in his former capacity  
as Vice President of the United States;

ELIZABETH “LIZ” CHENEY, in her former capacity  
as Chair, January 6 Commission;

JOHN KERRY, in his official capacity as U.S. Special  
Presidential Envoy for Climate;

GEORGE W. BUSH, in his former capacity as  
President of the United States;

BARACK HUSSEIN OBAMA, in his former capacity as  
President of the United States;

LORETTA LYNCH, in her former capacity as  
United States Attorney General;

JAMES BAKER, in his former capacity as White House  
Chief of Staff;

ERIC HOLDER, in his former capacity as United States  
Attorney General;

JOSEPH R. BIDEN, in his official capacity as President,  
his former capacities as Vice President and Senator, of  
these United States;

JOHN ASHCROFT, in his former official capacity,  
as United States Attorney General;

JAMIE GORELICK, in her official capacity, Homeland  
Security Advisory Council member;

**CIVIL DOCKET: 3:24-CV-00040  
ZNQ-TJB**

**ORAL ARGUMENT REQUESTED**

NANCY PELOSI, in her official capacity as Congresswoman (CA);

GEORGE NORCROSS, in his capacity as Chairman, Cooper University Medical Systems;

PHILIP MURPHY, in his official capacity as Governor of New Jersey, and as former Chair of the National Governors Association (NGA);

TAHESHA WAY, in her former capacity as Secretary of State, as former President of the National Association of Secretaries of State, and her current capacity as Lt. Governor, New Jersey;

JUDITH PERSICHILLI, in her official capacity as then-Commissioner of Health for the State of New Jersey;

SEJAL HATHI, in her official capacity as Deputy Commissioner for Public Health Services;

MATTHEW PLATKIN, in his official capacity as Attorney General of the State of New Jersey;

KATHY HOCHUL, in her official capacity as Governor of New York;

ANDREW CUOMO, in his former capacity as Governor of New York and his capacity as Vice-Chair of the National Governors Association;

LETITIA JAMES, in her capacity as Attorney General of the State of New York;

SUSAN RICE, in her official capacity as United States Domestic Policy Advisor;

ADAM SCHIFF, in his official capacity as Congressman, of the State of California;

CHARLES “CHUCK” SCHUMER, in his official capacity as Senator for the State of New York;

XAVIER BECERRA, in his official capacity as Secretary of Health and Human Services;

JANET YELLEN, in her official as Secretary of  
the United States Treasury;

ROD ROSENSTEIN, in his former capacity as United  
States Deputy Attorney General;

HUMA ABEDIN, in her former capacity as vice  
Chair of Hillary Clinton;

DEBBIE WASSERMAN SCHULTZ, in her current  
capacity as U.S. Representative, (FL-25);

BILL NELSON, in his official capacity as Administrator  
of NASA;

OCCIDENTAL PETROLEUM;

UNITED HEALTHCARE;

DEMOCRATIC NATIONAL COMMITTEE;

REPUBLICAN NATIONAL COMMITTEE;

JAMES PITTINGER, in his official capacity as Mayor  
of Lebanon Borough, State of New Jersey;

LISA SELLA, in her official capacity as Deputy Clerk,  
Lebanon Borough, State of New Jersey;

ROBERT JUNG, in his official capacity as Municipal  
Co-Chair, Republican Party, Lebanon Borough, State of  
New Jersey;

JOHN DOES (1-100)

JANE DOES (1-100)

Defendants.

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**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION HEARING DATE,  
PRELIMINARY INJUNCTION, AND TEMPORARY RESTRAINING ORDER**

Plaintiff, Mary Basile Logan, respectfully moves this Court for a preliminary injunction as set forth below and for the reasons set out in the accompanying Brief in Support of Plaintiff's Motion for Preliminary Injunction Hearing Date and Temporary Restraining Order. Fed. R. Civ. P. 65(a). Because there are only legal questions at issue, Plaintiff respectfully requests that this Court consolidate the preliminary injunction hearing with the trial on the merits and rule on the merits in accordance with Fed. R. Civ. P. 65(a)(2).

WHEREFORE, Plaintiff respectfully request the Court grant their Motion and issue a preliminary injunction pending a decision on the merits of Plaintiff's claims in this matter.

Dated: May 20, 2024

Respectfully submitted,

/s/ Mary B. Logan

Mary B. Logan  
Plaintiff, *Pro-Se*  
Post Office Box 5237  
Clinton, New Jersey 08809

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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEW JERSEY**

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MARY BASILE LOGAN, individually and on behalf  
of those similarly situated, *Pro-Se*;

Plaintiff,

MERRICK GARLAND, in his official capacity  
Attorney General, Department of Justice; et al.

Defendants.

**CIVIL DOCKET: 3:24-CV-00040  
ZNQ-TJB**

**ORAL ARGUMENT REQUESTED**

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**OPENING BRIEF IN SUPPORT OF**  
**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION HEARING DATE,**  
**PRELIMINARY INJUNCTION, AND TEMPORARY RESTRAINING ORDER**

Mary Basile Logan  
Plaintiff, *Pro-Se*  
Post Office Box 5237  
Clinton, New Jersey 08809  
(908) 200-7294  
Email: Trino@trinops.com

Dated: May 20, 2024

## NATURE AND STAGE OF THE PROCEEDINGS

1. On January 4, 2024, Plaintiff filed this lawsuit alleging that Defendants' collective actions, moving as co-conspirators to meet their ends, manifest in events abhorrent to the Constitution and to the inalienable Rights of the Plaintiff each taken under the color of law, depriving her of rights, privileges, or immunities in violation of 42 U.S.C. § 1983, the First and Fourteenth Amendments to the Constitution, and the Equal Protections Clause. Plaintiff now moves for a preliminary injunction. Plaintiff states that notice to the adversarial party and not perfected formal service is needed to assert jurisdiction to issue an injunction (*Whirlpool Corp. v. Shenzhen Sanlida Elec. Tech. Co., Ltd.*, Case No. 22-40376 (5<sup>th</sup> Cir. Aug. 25, 2023) (Barksdale, Southwick, Higginson, JJ.)) Plaintiff restates the inclusive claims as set forth in the amended complaint and supplemental submissions with Exhibits so accompanying, ECF 45; 45-1; 45-2; 45-3; 45-4; 45-5; 45-6; 45-7; 45-8; 45-9; 45-10; 45-11; 45-12; 45-13; 45-14; 45-15; 45-16; 45-17; 45-18; 45-19; 45-20; 45-21; 45-21; 45-22; 56; 46; 46-1; 46-2; 55; 55-1; 55-2; 55-3; 55-4 and 55-5, in support of the certified statements of harm herein.

## SUMMARY OF ARGUMENT

2. At the time of this writing the Secretary of State of New Jersey, serving a dual role as Lieutenant Governor, Defendant TAHESHA WAY, is preparing for the federal election. Ms. Way will follow directive from federal statute in accordance with the infrastructure designed under the Sector Specific Agency ("SSA"), as set forth in federal policy by then-Secretary, Department of Homeland Security ("DHS"), Jeh Johnson. The policy was adopted into the Department of Justice ("DOJ"), incorporating elections in and among the existing 16-Subsectors of protected assets. The protections were further emphasized by Defendant, JOSEPH R. BIDEN

in the Executive Memorandum of July 28, 2021, entitled, “National Security Memorandum on Improving Cybersecurity for Critical Infrastructure Control Systems.”<sup>1</sup>

3. Plaintiff states that the 2017 SSA model was built on the scaffolding of the 2015 Cyber Threat Intelligence Integration Center, designed and conceived by Lisa Monaco under the direction of DNI, James Clapper.

4. The codified statute and Executive Memorandum were designed to protect the Plaintiff’s sovereign vote, unimpeded in the determination expressed, not dissimilar from the intent of the Patriot Act following the tragic events of September 11, 2001.

5. Plaintiff’s states her vote informed by independent thought and evaluation of facts, otherwise unalienable, endowed by her Creator, cast in the fortification of those freedoms affirmed among them Life, Liberty, and the Pursuit of Happiness – securing her Rights, governments are instituted among men, deriving their just powers from the consent of the governed, by sovereign, sacred vote. Plaintiff files this pleading based on her autonomous analyses of data; findings set forth herein.

6. Preliminary injunctive relief is necessary to ensure that Plaintiff’s fundamental Right to vote, from which all other Rights enumerated are secure, remains sovereign. Emergent as it concerns the forthcoming election, sovereign and without impediment or usurpation by foreign or domestic actors; but with absolute anticipation of such usurpation, a matter of the highest consideration by the Honorable Court.

7. Defendants concede that the Right to vote is fundamental and sovereign, so stated in the Voting Rights Act of 1965, codified in policy as a protected asset in 2017 by the DHS

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<sup>1</sup> Biden, Joseph R. National Security Memorandum on Improving Cybersecurity for Critical Infrastructure Control Systems. July 28, 2021. Accessed April 27, 2024. <https://www.whitehouse.gov/briefing-room/statements-releases/2021/07/28/national-security-memorandum-on-improving-cybersecurity-for-critical-infrastructure-control-systems/>



Secretary as “so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters.”<sup>2</sup>

8. The United States Election Assistance Commission System Security Plan requires Center for Internet Security (“CIS”) configuration settings for Windows 10 Workstations. On December 15, 2020 Inspector General Layfield issued the final report for FY2020 U.S. Election Assistance Commission Compliance with the Requirements of the Federal Information Security Modernization Act (Assignment No. 1-PA-EAC-02-20) Chairman Hovland of the US EAC issued. The subject report moved on the issuance of an Authorization to Operate (ATO) for the Microsoft Azure implementation. Microsoft, (“MS”) a federal contractor, serving as the conduit software portal accessed by third party vendor/contractors (Hart/ES&S/Dominion); the vendor/contractor’s equipment interfaces with the MS portal, completing the build-out of framework for the United States elections, each facet having autonomous, statutory tests and comprehensive protective guardrails.

### **FACTUAL BACKGROUND**

9. Article 1, Section 4, cl. 1 of the U.S. Constitution, known as the Elections Clause, provides that States have primary responsibility for administering the elections, the federal government maintains significant authority over elections, including safeguarding the safety and integrity of congressional elections. Article II, Section 1, cl. 4 informs parallel constitutional provision addressing presidential elections with Congress determining the “time” of choosing presidential electors and the day the electors shall cast their votes, with that day the same

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<sup>2</sup> U.S. Election Assistance Commission, Starting Point. (UNDATED), authored by EAC following DHS inception January 6, 2017. Accessed April 24, 2024 [https://www.eac.gov/sites/default/files/eac\\_assets/1/6/starting\\_point\\_us\\_election\\_systems\\_as\\_Critical\\_Infrastructure.pdf](https://www.eac.gov/sites/default/files/eac_assets/1/6/starting_point_us_election_systems_as_Critical_Infrastructure.pdf)

throughout the United States. The Supreme Court has held that “[t]he importance of [the presidential] election and the vital character of its relationship to and effect upon the welfare and safety of the whole people cannot be too strongly stated” and that “Congress, undoubtedly, possesses that power...to preserve the...institutions of the general government from impairment or destruction...” Congress, exercising its authority under this provision, enacted legislation establishing an Election Day. The power to appoint electors and how those appointments are made, however, belongs to the states under Article II, Section 1, cl. 2.

10. Congress does not have general regulatory authority over state and local elections, but it may still exercise its power over such entities in several contexts including authority to prevent unconstitutional voting discrimination in a state or local election, authority to legislate regarding various issues derives, adding to its Article I powers, principally from the Fourteenth and Fifteenth Amendments, and relying on the Spending Clause authority under Article 1, condition of receipt of federal funds for state or local elections on compliance with federal requirements, including those expressed under the DHS Election Infrastructure Subsector policies.

11. The federal government lacks Constitutional authority to interface directly in local, county and tribal elections without being requested, prompted or otherwise authorized to gain such entry.

12. Plaintiff states that the 2016 Russian election interference claims were conceived as part of a broader scheme, undisclosed and, therefore, covert, planned and carried out by the Defendants, MERRICK GARLAND, LLOYD AUSTIN, WILLIAM J. BURNS, CHRISTOPHER A. WRAY, DENIS MCDONOUGH, ALEJANDRO MAYORKAS, MARCIA FUDGE, ROBERT CALIFF, WILLIAM J. CLINTON, HILLARY R. CLINTON, THOMAS

KEAN SR., ROBERT MUELLER, JAMES COMEY, CHRISTOPHER J. CHRISTIE, RICHARD “DICK” CHENEY, ELIZABETH “LIZ” CHENEY, JOHN KERRY, GEORGE W. BUSH, BARACK HUSSEIN OBAMA, LORETTA LYNCH, JAMES BAKER, ERIC HOLDER, JOSEPH R. BIDEN, JOHN ASHCROFT, JAIME GORELICK, NANCY PELOSI, GEORGE NORCROSS, PHILIP MURPHY, TAHESHA WAY, JUDITH PERSICHILLI, SEJAL HATHI, MATTHEW PLATKIN, KATHY HOCHUL, ANDREW CUOMO, LETITIA JAMES, SUSAN RICE, ADAM SCHIFF, CHARLES “CHUCK” SCHUMER, XAVIER BECERRA, JANET YELLEN, ROD ROSENSTEIN, HUMA ABEDIN, DEBBIE WASSERMAN SCHULTZ, BILL NELSON, OCCIDENTAL PETROLEUM, UNITED HEALTHCARE, the DEMOCRATIC NATIONAL COMMITTEE, the REPUBLICAN NATIONAL COMMITTEE, JAMES PITTINGER, LISA SELLA, and ROBERT JUNGE, herein after referred to as “inclusive Defendants”. These nefarious acts were deemed false upon investigative inspection, and each subsequent fabrication so too has proven a lie; however, not at any point in time, ever, have the inclusive Defendants taken action to remedy their egregious actions, to the contrary, they chose to double down, trespassing repeatedly on the unalienable Rights of the Plaintiff.

13. Plaintiff states that the Federal Bureau of Investigation (“FBI”) released a Brief dated August 30, 2016, which provided in part, that “[Redacted] cases on known or suspected Russian and Chinese IO’s posted to the U.S., document declassified by DNI Ratcliffe on 23 July 2020, signaling outwardly to the inclusive Defendants, the undercurrent scheme a momentum forward shift, proving overtly treasonous with the passage of time.

14. Plaintiff states that immediately following the November, 2016 election an extraordinary volume of allegations concerning foreign election interference became the vitriol of the inclusive Defendants, investigations ensued. The investigative determinations portrayed

the same schisms as represented outwardly by those elected, at all levels of government; analysis of the facts has provided disclosure of the undercurrent scheme that sustained that schism, giving it breath, presented herein. The investigative reports are listed below which the Plaintiff reviewed, retains same in repository.

- i. The Federal Bureau of Investigation (“FBI”) and the Department of Justice (“DOJ”) released their findings report in June, 2018.
- ii. House Intelligence Committee investigation, (“HIC”) Chairman Devin Nunes and Ranking Member, ADAM SCHIFF, a Defendant to this action, House Permanent Select Committee on Intelligence – Russia Investigation (2016 U.S. Election) Reports.
- iii. Office of the Inspector General (“OIG”) released findings report on June 14, 2018.
- iv. CIA Assessment report released December 10, 2016. Conflicting reporting from media presented to the public, the Washington Post reporting that “Russian operatives covertly interfered in the election campaign in an attempt to ensure the Republican candidate’s victory.”<sup>3</sup> In contrast, the New York Times reported that “intelligence officials had a ‘high confidence’ that Russia was involved in hacking related to the election.”<sup>4</sup>

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<sup>3</sup> Gayle, Damien (The Guardian). December 10, 2016. “CIA concludes Russia Interfered to help Trump win election, say reports. Accessed May 13, 2024. <https://www.theguardian.com/us-news/2016/dec/10/cia-concludes-russia-interfered-to-help-trump-win-election-report>

<sup>4</sup>

- v. Office of National Intelligence – Assessment Background: Assessing Russian Activities and Intentions in Recent U.S. Elections – The Analytic Process and Cyber Incident Attribution. Dated: January 6, 2017.
- vi. House Permanent Select Committee on Intelligence – Report on Russian Active Measures, March 22, 2018.
- vii. Special Counsel ROBERT S. MUELLER, a Defendant to this action, issued findings report pursuant to 28 C.F.R. § 600.8(c), dated March, 2019, Volumes I and II.
- viii. Select Committee on Intelligence, United States Senate on Russian Active Measures Campaigns and Interference in the 2016 U.S. Election, Vol. 1-V, November 10, 2020.

15. Lisa Monaco was appointed by Defendant, BARACK HUSSEIN OBAMA as Assistant Attorney General for National Security in 2011, with responsibility of overseeing major counterterrorism and espionage cases. According to the record of her tenure, Ms. Monaco was principally focused on matters of intelligence, foreign cyber threats, and guiding the Defendant, BARACK HUSSEIN OBAMA throughout his unlawfully held tenure. Ms. Monaco served throughout the investigations of the Awan Brothers, Enron, AIG, TARP and SIG TARP, among others. Plaintiff seeks the Honorable Court's consent to add Lisa Monaco as a Defendant to this action.

16. The Trump Administration Department of Justice, obtained subpoenas filed with Apple and Microsoft, same held under gag order, which expired in 2021 relating to an investigation overseen by AG Sessions and, following his departure, AG Barr. In 2021, the gag

orders expired concurrent with the timeline of Ms. Monaco assuming her present role as Deputy Attorney General. Ms. Monaco referred the query of law to the Office of Inspector General.

17. Learning of the subpoenas for the first time, Defendant CHARLES “CHUCK” SCHUMER spoke to the press regarding the subpoenas stating, “This is a gross abuse of power and an assault on the separation of powers. This appalling politicization of the Department of Justice by Donald Trump and his sycophants must be investigated immediately by both the DOJ Inspector General and Congress.”<sup>5</sup> Defendant, ADAM SCHIFF stated that referred the matter to the OIG was “an important first step...(but) will not obviate the need for other forms of oversight and accountability – including public oversight by Congress – and the Department must cooperate in that effort as well.”<sup>6</sup> The statements of these Defendants, shatter the scales of Justice; the Defendants’ holding to audacity, Donald Trump holding to Executive authority of the Constitution. And yet, as Donald J. Trump stands trial for *yet* another fabrication, absent jurisprudence whatever but for the abuse of power exercised by the unlawfully seated Executive, the Defendants’ his cheerleaders; the Plaintiff observes in absolute disgust, her Rights of independent, autonomous candidate choice of absolutely no consequence to the inclusive Defendants.

18. In assuming her oath, at the direction of her superior, Defendant, MERRICK GARLAND, Ms. Monaco was primarily tasked with “surfacing potentially problematic matters deserving high level review”<sup>7</sup>. Ms. Monaco encouraged Congress to pass cybersecurity legislation while engaging the press to reinforce her policy position.<sup>8</sup> Plaintiff has read and

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<sup>5</sup> Breuninger, Kevin. DOJ Watchdog Will Probe Reported Trump-era subpoenas of Apple for Democrats’ data. June 11, 2021. Accessed February 10, 2022. <https://www.cnbc.com/2021/06/11/schiff-calls-for-probe-into-trump-doj-seizing-house-democrats-data-.html>

<sup>6</sup> *Ibid.*

<sup>7</sup> White Vance, Joyce. “Perspective – Garland inherited a booby-trapped DOJ. Here’s why it won’t be easy to fix. Washington Post. ISSN 0190-8286, Accessed October 16, 2021.

<sup>8</sup> Vicens, A.J. (April 24, 2023). “To combat cybercrime, US law enforcement increasingly prioritizes disruption.

analyzed the GAO Reports February, 2024 for the Department of Homeland Security and Cybersecurity, respectively. The reports reflect an absolute dereliction of responsibility to the American People, despite the vitriol and policy action to advance written statements in the respective Departmental areas, the GAO reports state, quite clearly, there was very limited actionable movement advanced by Ms. Monaco, derelict in ability to delegate as much her own time management. Plaintiff states, the reports are indicative of Ms. Monaco actions and commitment to the undercurrent scheme; feeling the weight of the apparatus on the receiving end, Plaintiff surmises their time, while consuming, was for not; Freedom will prevail.

19. John Carlin, as Acting Deputy Attorney General, in the company of Ms. Monaco and Defendant, MERRICK GARLAND, spoke with reporters on February 26, 2021 regarding January 6, 2021 stating, “The Jan. 6 attack was ‘not America and it will not happen again...we must return to an America where no one fears violence for who they are or what they believe...pledge that federal law enforcement was putting together a response plan for all extremist threats that included the ‘detection, disruption and deterrence of domestic extremists.’”<sup>9</sup> Plaintiff states Carlin has vacated his position in advance of the frontline to their plan, a coward, the God that gifted this dominion will assure her retention, human hands cannot foreclose the Law as resolute as those who gave their lives for her retention.

20. On September 27, 2016, Rep. Ted Lieu, authored a letter concerning the “cyberattacks on our federal government have increased by 1,300 percent in ten years. Yet over 1,000 GAO recommendations to improve cybersecurity have failed to be implemented by federal agencies as of September 16, 2016.

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Accessed May 16, 2024. Cyberscoop.com

<sup>9</sup> Goudie, Markoff, Tressel and Weidner. Feds Pledge Another DC Domestic Terror Attack ‘will not happen’. February 26, 2021. Accessed February 10, 2022 <https://abc7chicago.com/us-capitol-threat-insurrection-riot-january-6/10373169/>

21. On June 26, 2017, Rep. Ted Lieu, authored a letter to the Honorable John F. Kelly, Secretary of Homeland Security, regarding cybersecurity at the Trump owned (private owned) properties, inclusive. Rep. Lieu cited specific foreign diplomats and leaders, having no merit of a Congressional Representative and well within Executive authority. Rep. Lieu closed his letter with “Trump-owned commercial properties have been subject to cyberattacks in the past, and one can only assume such attacks have increased since Mr. Trump took office. When asked about these breaches, the White House reportedly declined to comment.” Thereafter Rep. Lieu posed a list of queries, requesting a reply. Plaintiff states that Rep. Lieu did not and has not served as Secretary of Cybersecurity, he did and has, however, worked alongside the Awan Brothers in the company of the inclusive Defendants as they breached our National Security.

22. Plaintiff draws attention to the investigation Marc Baier (former NSA), Ryan Adams, and Daniel Gericke, (both former military and intelligence community personnel) who between January, 2016 – November, 2019 worked for DarkMatter, a United Arab Emirates, a wholly owned government enterprise. Prior to this employment the subject parties were employed by CyberPoint International LLC, (“CyberPoint”), and would become founding members of a Raven Team for DarkMatter in a program for Cyber Intelligence-Operations (“CIO”). The parties are subject of violations of the Arms Export Control Act (*See* 3:21-cv-01787-IM). Plaintiff reviewed the case documents, germane to her research and analysis of the subject pleading. Plaintiff states as a matter of record, this is the second incident of major national security breach during the stated time period, 2016 – 2019. Despite the foregoing, limited background checks and screenings are completed on Contractors, this runs counter with standard protocol; the fact that is recurrent adds insult to injury. There is to measure of



acceptance that those in charge of our National Security would be so absolutely complacent and derelict in their responsibility to our Country.

### **COVID-19 AND THE GLOBAL PUBLIC PRIVATE PARTNERS**

23. Following the 2016 Presidential Election, an extraordinary scaffolding of non-profit entities was amassed who would become woven into the substrate of our Republic as circumstance presented, circumstances for which the non-profit were particularly suited, trained and staffed in a turnkey, clairvoyant fashion. Plaintiff states that the non-profit and for-profit organizations have statistically significant association with the inclusive Defendants.

24. The amassed non-profit and for-profit entities coalesced with multinational corporations their affiliation, incorporating former BCC International (“BCCI”) “criminal enterprise” members, (*See* ECF 45-1). The statistical parallels between present-day non-profit and for-profit entities as analyzed against those associated with BCCI exceed probability or chance, facts which Plaintiff examples below. Plaintiff states that the non-profit entities below are a sample of the repository of over 1,700 non-profit, 501c3, SEC and corporate filing records. Plaintiff states that Microsoft is one such conduit corporation, which is allowing for affiliate partners (public private partners) to knowingly trespass on Plaintiff’s sovereign Rights.

- i. VotingWorks – a 501c3 entity, founded in November, 2018 by Ben Adida and Matt Pasternack. Board Members include John Lilly and Ryan Merkley. VotingWorks is a principle Public Private Partnership (“P3”) entity involved in the Risk Limit Audit, which replaced the former election audit structure in 2020, first as a pilot, and thereafter incorporated as a standard election process. First presented to Congress in 2019 through three sources, each

having an interface with the primary P3 entity, VotingWorks, including Microsoft.

- ii. Ben Adida – Studied at MIT (Cryptography and Information Security), presently employed by Microsoft. Specialty in authentication infrastructures, electronic voting, reliable and secure transactional storage. Member of Creative Commons, the Center for Strategic and International Studies Authentication Workgroup.
- iii. John Lilly – General Partner with Greylock Partners, venture capital and the former CEO of Mozilla. Greylock Partners specializes in AI, cryptocurrency, Fintech and Cybersecurity. In 2009, Reid Hoffman joined Greylock Partners as an investment partner. In 2020 Mozilla announced it would cut 25% of its worldwide staff of nearly 1,000 to reduce costs, despite this, executive pay increased 400% with Mitchell Baker received \$2.4m in 2018. In December, 2020, Mozilla closed its Mountain View, Santa Clara, CA property. In 2023, Mozilla announced the launch of Mozilla Ventures, a venture capital and product incubation facility out of Mozilla for independent start-ups, seed to Series A which qualify under the Mozilla Manifesto with a starting fund of \$35m. Its founding Managing Partner, Mohamed Nanabhay, previously served as Head of online Al Jazeera English, serving as an advisor to the Director-General, Qatar. Previously served the Advisory Board of the Creative Commons and a former member of the World Economic Forums' Global Agenda Council on Social Media who presently serves at MIT, connecting social innovators led by Sony, the Bill and Melinda Gates

Foundation, General Motors, Hermes, etc. Mohamed Nanabhay – Mozilla Ventures launched Lisbon Portugal project (2022) \$35m venture to decentralize digital power and build more trustworthy AI. Reid Hoffman serves on the Board of Directors for Microsoft.

- iv. Risk Limit Audit (“RLA”) – Microsoft launched the Risk Limit Audit as a pilot program in 2019, a post-election tabulation audit for elections designed to check the accuracy of the reported election outcomes drawing from defined samples of the collective, broader data. The program has been incorporated into the assessment of important election security, included in the training protocol to prevent, detect, and recover from cyber-attacks at the state and local level.<sup>10</sup> The program is a collaboration between the Brennan Center for Justice, a non-profit led by Michael A. Waldman, formerly serving as Defendant, WILLIAM J. CLINTON’s speechwriter; the Common Cause which was formerly chaired by Robert Reich, the former Secretary of Labor, appointed by Defendant, WILLIAM J. CLINTON.; the National Election Defense Coalition (“NEDC”), former Board includes Ben Adida (see i, above – VotingWorks), Ernst and Young, Google, among others. The RLA was introduced in the State of New Jersey for the 2020 election as a pilot. Plaintiff refers to ECF Doc. 46, the RLA does not measure against ballot custody end-to-end informing of the sovereign voters’ cast vote, ballot stuffing or the myriad of interference with sovereign election that Plaintiff has witnessed by first-hand account.

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<sup>10</sup> Microsoft. Making Every Vote Count: A Practical Guide to Risk-Limiting Audits. January 31, 2019 (Training Presentation). Accessed January 10, 2020.

25. Plaintiff states that the foregoing facts echo the footprint and mapping of BCCI, inclusive of the accounting firms. The inclusive firms hold resolute to political ideology, dismissing an unbiased, non-partisan posture of the formulation, outcome testing, and cybersecurity for the United States elections end-to-end process.

26. In 2018, Microsoft launched the Defending Democracy Program. The program was designed and promoted as a mechanism to address security challenges that were “at the forefront of the public’s consciousness since 2016,”<sup>11</sup> resulting from the bedlam following the 2016 election while in advance of the mid-terms and forthcoming presidential election.

27. In April, 2020, Microsoft launched the Threat Intelligence Center, (“MSTIC”) in advance of the presidential election, promoted as having a principal focus on cybersecurity with adaptive voting with key interface between federal, state and local stakeholders. “In states where vote-by-mail is already the norm, such as Oregon and Washington, the necessary infrastructure, budgets and even culture already exist. It would be difficult for other states to replicate that in a handful of months, especially under current remote working conditions. There are tangible steps that states can take, however, to expand existing absentee voting processes so as to provide a safe method of voting for all in November.”<sup>12</sup> Plaintiff states that the program ran counter to its intent, a trojan horse presented on behalf of DHJ and the DOJ who would otherwise not have access to local, state, county and tribal persons running the elections in conformity to the Constitution.

## 2020 ELECTION AND CYBERSECURITY

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<sup>11</sup> Microsoft. (2018). Defending Democracy Program. The 2020 U.S. Elections: Readyng for the Challenges. Accessed April 10, 2024 [https://blogs.microsoft.com/wp-content/uploads/prod/sites/5/2020/04/MSFT\\_ES\\_Whitepaper\\_FINAL.pdf](https://blogs.microsoft.com/wp-content/uploads/prod/sites/5/2020/04/MSFT_ES_Whitepaper_FINAL.pdf)

<sup>12</sup> *Ibid.*

28. Feigning retention of the lawful framework of the Constitution, DHS has developed protocols for election security, attached as EXHIBIT 1. The protocol defines state and local officials' roles and responsibilities within the election with collaboratives and interface with DHS, by request. The protocol includes the newly formed Government Coordinating Council (Exhibit, p.3), and the Sector Coordinating Council (*id.*), each interfacing with CISA while fostering membership with MS-ISAC, a Microsoft support platform for governmental bodies, local, county, and state dedicated to internet security; a Constitutional usurpation to meet treasonous aims, aiding and abetting foreign nation-states and unknown parties into the sacred process of the Plaintiff's vote.

29. In 2020, MS-ISAC, a federally funded collaborative, (\$38m in 2024). The collaborative project began in 2018, with limited participation, in 2020 had a member roster of 10,000 across the United States; today the member body has extended to 17,000 state, local, tribal and territorial governmental organizations, a distinct, coordinated work-around of the Constitution as well the statutes that buttress to fortify the scribed words. These documents, carry with them a weight and certain depth, not requiring of interpretation as confine of action within; Plaintiff states by the actions of DHS and *their* contractor, paid by Plaintiff's taxes, they are holding hostage the Constitution as well the Plaintiff's sovereign voice expressed in her vote; wholly unacceptable by all measure of law.

30. In November, 2021, the New York Times reported that the FBI contracted with Riva Networks, which in turn permitted access of an NSO tool as a component of an investigation, Defendant, CHRISTOPHER WRAY terminated the contract with the contractor in April, 2021, as the discovery was made. On August 1, 2023, the FBI reported, "[it] has not

employed foreign commercial spyware in these or any other operational endeavor...this geolocation tool did not provide the FBI access to an actual device, phone or computer.”<sup>13</sup>

31. On August 1, 2023, the FBI reported cyberhacking had occurred within the FBI alleged to have originated from software installed on an iPhone Apple product. The hacking tool maker was produced by NSO Group. In April, 2023, the New York Times reported that a contractor had bought and used the NSO software, known as Pegasus, developed by Israel which allowed covert and remote installation on mobile phones running iOS and Android, using a zero-click exploit. The software was first reported in August, 2016, by Ahmed Monsoor, a human rights worker with Amnesty International.

32. Plaintiff analyzed the subject investigation, the following findings of significance resulted.

- i. The date of first mention (August, 2016) coincides directly with the Awan Brothers having been given carte blanche access to the Congressional internet accessed platforms, unimpeded by Capitol Policy or internet security by the knowing hand of the inclusive Defendants, same a matter of historic record, investigative compromise by knowing hands, including that of Defendant, DEBBIE WASSERMAN SCHULTZ, who retained Imran Awan, until April, 2017, defying Capitol Police orders.
- ii. Plaintiff audited for companies with the name RIVA, via open-source, findings as below:

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<sup>13</sup> Owen, Malcolm. Embarrassingly, a FBI Investigation Discovered that the FBI was Using Blacklisted iPhone Hack Tools. August 1, 2023. Accessed May 5, 2024 <https://appleinsider.com/articles/23/08/01/embarrassingly-a-fbi-investigation-discovered-that-the-fbi-was-using-blacklisted-iphone-hack-tools>

- a. RIVA FZC, 18 locations; Virginia (Free Trade Zone, Ras Al Khaimah – UAE); IA; KY; MO; NH; VA (Free Trade Zone – Ras Al Khaimah – UAE), VA (Foreign – 2<sup>nd</sup> location); VT; MA; NV, NM; TX; WV (Address provided: Ras Al Khaimah – UAE) – all foreign registry. CT (Domestic registry). LA ; AK (undisclosed). Inclusive registered with Vishal Manjlani as named Director.
- b. RIVA FZC, principal and mailing address as: P.O. Box 16113, Ras Al Khaimah, UAE OC.
- c. RIVA FZC, IA – Brijesh Joshi, President. Mailing address: Business Center 4, Business Park, Rak Free Trade Zone, Ras Al Khaimah 00 AE.
- d. RIVA GAS INC. – Mailing address: 170 Veterans Memorial Parkway, Commack, NY 11725. Ali Shaukat, CEO, Commack, NY 11725.
- e. International Telecommunication Filing – open source. Applicant: Riva FZC, F/19, Business Centre 1, RAK Free Trade Zone, Ras Al Khaimah, UAE, Mr. Brejesh H. Joshi. Secondary company: RIVA Technologies, Inc., registered to British Virgin Islands.

- f. Ali Shaukat search – open source. Registered FL:  
Azan & Ali Petroleum, Inc.; Ali Shaukat, President;  
Shuja Uddin, VP. 18700 N.W. 2<sup>nd</sup> Avenue, Miami,  
FL 33169.
- g. Shuja Uddin search – open source. 8 Companies  
including Azan & Ali Petroleum, Inc.;  
Compassionate Children's Services, LLC (IL); Lilu  
Corp (2-FL Domestic registry); Pasha Trading,  
LLC. – FL; SMC Virginia, Inc. – VA; Tishna Films,  
Inc. – Texas (2-Domestic registry) Wren Gray  
Foster, President. Shuja Uddin Sheikh (Meta);  
Quran Academy; has wikipage which notes  
extensive global travel lecturing with program  
approved by the Federal Ministry of Education,  
Government of Pakistan.
- h. Orion Petroleum (FL undisclosed if Foreign or  
Domestic); Boorak and Azan Florida, Inc. registered  
owners, 3584 SW Armellini, Palm City, FL 34990;  
Manjur R. Chowdhury (AMBR) Deshi Farm LLC.  
1018 Aspri Way, Riviera Beach FL 33418; Liberty  
Lotus Ranch LLC. 10335 Highway 710,  
Okeechobee FL 34974. Common contacts, all  
three: Manjur R. Chowdrey, Mgr., Mohammed N.



Haque, Mgr., Sonia J. Khan, Mgr.. – all different addresses.

- i. Sonia Khan – 50 registrations, suggesting some may not belong to the same party above or she is a registering agent or Title registrant, this theory is dismissed when there is a registering agent and her name appears as contact).
- j. From the foregoing, Plaintiff reasserts the claims of harm herein as well the inclusive pleading record as set forth above.

33. Plaintiff states that Landmark OpenWorks R5000 software is directly associated with Halliburton's drilling and evaluation division. Business record for Landmark, registered domestic corporation on December 28, 1999, dissolved. David B. Heron, Director of 7 Sprint Cove Road, Nashua, NH 03062. Plaintiff states that the United States Federal government was contracting with a company who had been dissolved, not viable to process payment or be insured in carrying out the contracted services.

34. Plaintiff states as to the foregoing findings, either one of two things are true; either the FBI knowingly fudged the investigation, never having compiled a rudimentary background check in advance of awarding the contract, or the Plaintiff's claims of covert traverse by internal governmental bodies, inclusive of the FBI, knowingly allowing foreign agents to partner through bid or application to consummation is correct; there is no other explanation that would suffice to extinguish the findings.

35. In July, 2023, Microsoft announced the formation of a new Election Technology Initiative (ETI), of which Microsoft ElectionGuard will be its first project. ElectionGuard was developed by Josh Belaloh, a Microsoft Research cryptographer, trained at MIT and the developer of the Risk Limit Audit. Plaintiff refers the Honorable Court to the history in the amended pleading (*See* ECF Doc. 45).

36. Plaintiff states as a matter of historic donor and collegiate record, Defendant, WILLIAM J. CLINTON and Jeffrey Epstein a long-standing close association with MIT. Jeffrey Epstein would source equity partners to finance emerging projects, in many cases acting as a conduit to the franchise as a middleman for which he was compensated, this is a rinse/repeat, textbook BCCI model.

#### **ECONOMIC WARFARE**

- i. The Firmament Group (“Firmament”) is a leading provider of tailored solutions to small and medium sized enterprises (SME) with a focus in cybersecurity; healthcare, software, health and wellness, food and agriculture sectors. Below is a sample of Plaintiff’s findings. Each of the inclusive private equity partners evidenced two outcomes; 1)change the dynamic of private business with the introduction of international market exposure through 2)financial partners with opaque monetary structure. In many cases, the primary business retains their original name and existing reputation while extending themselves financially through fiscal partners beholden, layering international dark money partners.

- ii. CyberPoint International, which was subject of the cyber investigation of Marc Baier, Ryan Adams, and Daniel Gericke (*See*: <https://casetext.com/case/alhathloul-v-darkmatter-grp-1>). CyberPoint International was formed in 2009; Karl Gumtow and Vicki Gumtow who share business affiliation with Customer Value Partners (“CVP”) which included the Guntows, as above, and Anirudh Kulkarni, they share affiliation with Dov Levy and Elma Levy who own Dovel Technologies.
- iii. Anirudh Kulkarni is the CEO of CVP (Customer Value Partners) was awarded a contract with NIH Mission Alignment, Blanket Purchase Agreement, contract to support scientific research missions across NIH with IT programs and technical support, cybersecurity and risk management.
- iv. In 2021, the Firmament Group announced an investment in CyberPoint International LLC., the amount of the investment was undisclosed.

37. Plaintiff analyzed CyberPoint, having no registration as CyberPoint International, there are three registrations for CyberPoint, two as “Inc.” and one as “LLC” (see EXHIBIT 2).

- i. Plaintiff’s analysis moved from CyberPoint records in the United States to CyberGlobe (India) Private Limited. CyberGlobe provides microloans to businesses and enterprises. CyberGlobe is owned by Mohammed Yunus Kazi, Vandana Dungardas Saral, and Syed Kaleemullah. Together, they own Click Cricket Limited,

EBMS Solutions Private Limited, Click Tickets.com Private Limited.

- ii. CyberTemps, Inc. – Domestic Corp., 1257 Raleigh Road, Mamaroneck, NY 10543, registered to Edward O'Reilly, CEO. Edward O'Reilly registered to the Citadel, Senior Managing Director and Global Head of Client and Partner Group. Mr. O'Reilly began his career at the O'Connor Partnership, Chicago. UBS, Swiss Bank Corporation. Member: The Economic Club New York; The Aspen Institute; The Development Board for the Brunswick School in Greenwich, CT; Chairman, North American Standards Board of Alternative Investments.
- iii. Muhammad Yunus is presently under investigation by the High Court, case filed in the Rangpur Labour Court with six (6) Defendants for money laundering and fraud. Dr. Yunus is a Nobel laureate and runs an organization named Grameen; Grameen American (501c3); Grameen PrimaCare; Yunus Social Business; Grameen Promotoras (GP); donor to Defendant, HILLARY R. CLINTON; Karen Pritzker serves as the President, Grameen America who is the cousin of Penny Pritzker, serving on the Board of Microsoft.

38. Plaintiff cites the direct involvement of Karen Pritzker to the primary sourced focus; the following are additional findings:

- i. Grameen America provides micro-loans on a need defined basis.  
Locations in the United States: Jackson Heights, Queens;  
Brooklyn; Bronx; Manhattan; Nebraska; Indianapolis; Charlotte;  
San Francisco; Los Angeles; San Jose; Austin; Union City (NJ);  
Boston; Miami; Houston; Texas; Atlanta; Memphis; Trenton (NJ),  
and Connecticut.
- ii. Key partners: American Express; Apax Foundation; Apple; Bank  
of America; Bank of the West; BCG; Betty Buzz; Capital One;  
Citi; East West Bank; Etsy; Fondation CHANEL; Goldman Sachs  
(One Million Black Women); Google.org; JP Morgan Chase; Kekst  
CNC; Center for Inclusive Growth; Medtronic Foundation;  
UnionBank; PayPal; Prudential; Regions Bank; Synchrony  
Financial; TD Bank; Truist Foundation\*, USBank; Wells Fargo\*,  
Whole Planet.
- iii. Supporters: Ameriprise Financial; BBKA Foundation; Centerview  
Partners; CityNational Bank; DoorDash; HSBC; Mia Becar;  
Mizuho Americas; Morgan Stanley; Tableau Foundation; and  
Zumba Fitness LLC.
- iv. Karen Pritzker, Director, Grameen America. Sibling: ret. Lt.  
Colonel, Ill. State National Guard and Founder, Pritzker Military  
Library; Linda Prizker, an American Lama of the Tibetan Buddhist  
tradition. Marmon Group ties with brothers, Jay and Donald  
Pritzker – built 60 business enterprises, including Hyatt Hotel

chain (1957), owned Braniff Airlines (1983-1988). Sold off smokeless tobacco company to Reynolds American, Inc. (2007); sold Marmon Group to Warren Buffet's Berkshire Hathaway (2010); sold majority stake in Transunion (undisclosed amount) to Madison Dearborn Partners. Pritzker manages a diverse asset base of emerging biotechnology, medical device companies, consumer technology products, and real estate while operating LaunchCapital, LLC, a venture fund. My Hero Project (501c3 – 1995).

- v. The Seedlings Foundation (501c3 – 2002). Provides grants, catalyzing advancements in medical research, social services, job retraining for adults; affordable housing; online news sites. Philanthropic pursuits/donor: Teach for America; Michael J. Fox Foundation.
- vi. Teach for America association has direct relationship with current President of Microsoft where Ms. Pritzker's cousin serves as a member of Board of Directors, a closed circle, entwined.
- vii. Grameen Foundation (Washington, DC) partners around the world with a mission to enable the poor, especially women, to end poverty and hunger. It uses digital technology and local partner networks to create solutions that span financial, agricultural and health services. Funded by private donors and with the lion's share provided by USAID, funding the microloans. Grameen was

subject of an investigation by Senator Charles Grassley – Plaintiff affirms his claims and will seek discovery. Plaintiff states, the foregoing loans impose on the Emoluments Clause, Grameen a donor to the Clinton Foundation, as Secretary of State, she leveraged her capacity in her interest, as varied as they are, the law is absolute and Justice must be served accordingly.

- viii. Plaintiff states that Grameen has every marker of a global human trafficking enterprise, advantaging themselves over the human interest of their “clients,” in point of fact, he is presently under investigation for money laundering, a sibling to these other crimes and atrocities.
- ix. Plaintiff’s analysis provides historical ties to British Raj.
- x. Yunus Social Business (501c3) and investment arm Yunus Funds with ties to Grameen Danone Foods.
- xi. Uganda – bike rental and affordable, purified water.
- xii. Brazil
- xiii. Colombia
- xiv. India
- xv. Albania, Tunisia and Haiti – withdrew at a time of exceptional crisis which runs counterintuitive with a service organization.

B. McAfee came to the attention of the Plaintiff through the Crowdstrike analysis as regards the DNC manufactured election interference investigations; the DNC recommended Crowdstrike be retained for what is now evidenced to have been

manufactured claims of cyberbreaches. The fact that the breach was untrue, a fabrication, drew Plaintiff's attention back to the National Association of Secretaries of State ("NASS") 2020 keynote presentation of Clint Watts (*See* ECF Doc. 45-22), in particular, the artful presentation on counterterrorism in relation to cybersecurity. Plaintiff applied the Watts lens in revisiting the findings of CrowdStrike who first "identified" the malware, "FancyBear" aka APT28 or Sofacy, as the GRC (Russian military). Plaintiff analyzed the principal owner of CrowdStrike, Dmitri Alperovitch, who formerly worked at McAfee prior to joining CrowdStrike.

- i. Intel purchased McAfee in 2011 (2010), becoming part of the Intel Security division, Advent International Group, Permira Advisers, and Crosspoint Capital Partners acted as the conduit investor group, a middleman.
- ii. In 2017, Intel Security entered into a strategic partnership with TPG Capital and converted Intel Security into a joint venture between both companies, called McAfee.
- iii. John McAfee, a former NASA programmer and mathematician, founder of McAfee Corporation (1987), the antivirus software designed with a Windows-focus. The programming was built on searching for and removing self-replicating malicious software.
- iv. Thoma Braco, a private equity firm, took a minority stake in the new company and Intel retained 49% holding.
- v. In 2020, and in 2022, an investor group led by Advent International took it private again. Through these partnerships, the investor relationship



created an international partnership with the Canadian Pension Plan, GIC Private Limited and the Abu Dhabi Investment Authority.

- vi. Advent is a buy-out company, rated one of the largest Private Equity International firms in the world, commencing operation from Poland (1995), expanding to Great Britain (2002), Bulgaria (2004), and lululemon athletica, a relationship affirmed with Advent and Highland Capital Partnership, retaining partial equity and selling partial equity to Advent/Highland Capital Partners, concealing the true originator of the entity.
- vii. McAfee presently serves as cybersecurity contractor for the Department of Veterans Affairs, among other governmental entities in the United States. McAfee is not a domestic corporation, fiscal holding will verify, opaque with financial partners including the United Arab Emirates (“UAE”).

39. Crowdstrike, is a foreign enterprise. Crowdstrike, not unlike the Awan Brothers, was given open access to NATSEC matters, Congressional records and the like based on alleged claims of cyberhacking as provided in Plaintiff’s amended complaint (*See* ECF 45). The investigations, while appreciative and vast in expression of political posturing, accomplished little in addressing Plaintiff’s harm, as disclosed herein.

40. Plaintiff states that our Nation’s Executive has seen fit to consent to contracts with opaque foreign entities, the truth hidden behind a crooked smile while our Nation’s military serves in various corners of the globe due to *his* failure to maintain the peaceful posture of diplomacy which he inherited from his predecessor. These consummated relationships with private equity, entities used as investment vehicles, pump, and dumps by a select few with

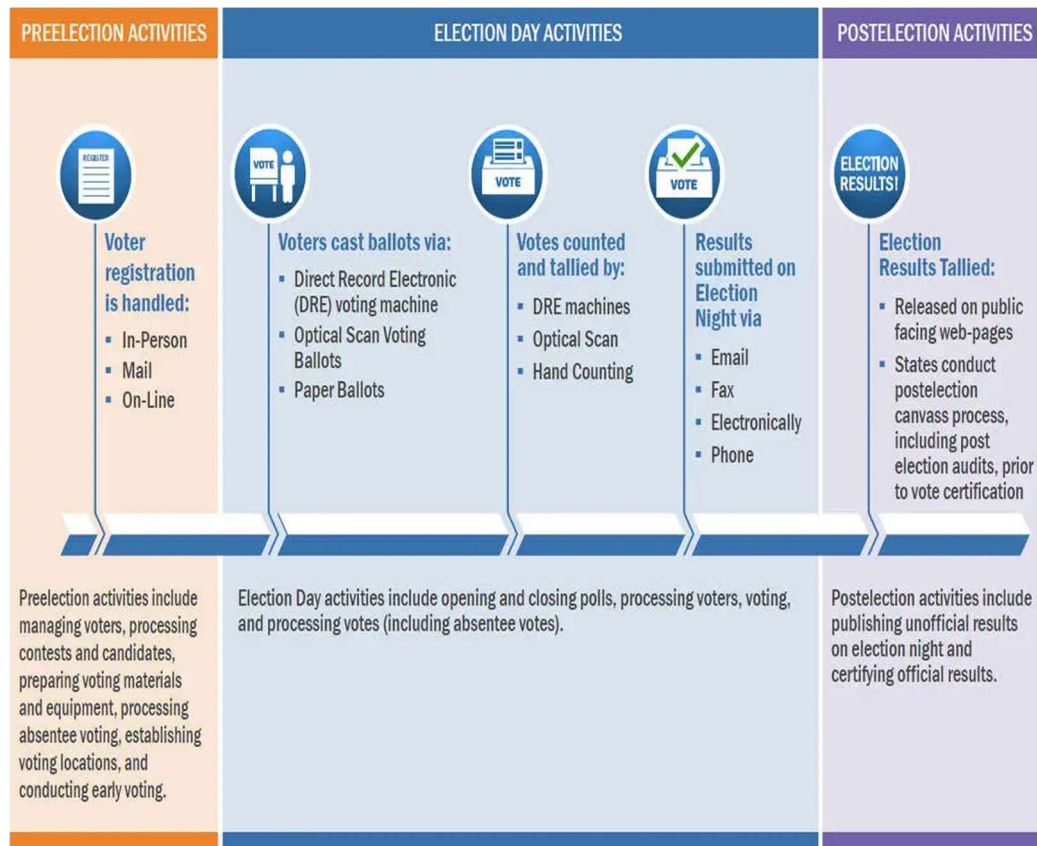
insider knowledge in Washington, D.C., House and Senate, among others, apart from public disclosure. All the while our finest assets, those wearing helmets and boots standing in our stead and interest are left vulnerable and so too is our Nation. The foregoing is a NATSEC risk of highest consideration to this Honorable Court.

41. Plaintiff draws attention to the tunnels located in the Rafah, an area which he chose to protect over our ally, Israel; these discoveries disclose the truth concerning Defendant, JOSEPH R. BIDEN's foreign policy posture which echo in relation to the Microsoft Wisconsin development project, equally germane to the content presented.

42. Combining the foregoing with the clear facts presented under the commercial backed mortgage securities ("CMBS") claims of harm in the amended complaint (*See* ECF 46), there exists a clear and present danger of our economy in peril. The usurpation of Executive authority in retaining closure of the economy following the spikes of COVID-19 are haunting the exceptionalism of the American economy today; the covert planning and determination of the Governors, inclusive of the Defendants herein, ANDREW CUOMO, PHILIP MURPHY and KATHY HOCHUL who in their company, with co-Defendants, LETITIA JAMES, MATTHEW PLATKIN, JUDITH PERSICHILLI, TAHESHA WAY, not only killed our Veterans in nursing homes, but as time has disclosed, their collective malevolence was manifest in a broader plan. Plaintiff provided as EXHIBIT 3, Abu Dhabi purchase of lands in New York City as well Texas, a knowing hand moving under the surface of our economy under the watchful eye of the collusive parties of inclusive Defendants, traitors in our midst.

#### **THE 2024 PRESIDENTIAL ELECTION, THE THRESHOLD OF INSOLVENCY**

43. Plaintiff analyzed the election hardware and technology which runs through the Microsoft Azure platform for the United States elections, as pictured below, taken from the DHS supplement on election security.



44. HART INTERCIVIC:

- i. Hart InterCivic – an Austin-based company with more than 100-years of election experience.
- ii. In 2018, Hart InterCivic promoted Verity and its associated platform services including the Verity Touch Writer, an ADA compliant paper ballot marking device, the Verity Scan which allows voters to feed their marked ballots directly the tabulator and verify their cast vote and Verity Print, an on-demand ballot printing solution.

- iii. “End-to-end verifiability also enables independent election security experts to build verifier programs that can independently confirm the accuracy of the overall vote count for elections that incorporate ElectionGuard software...the combination of Hart voting machines and ElectionGuard technology delivering end-to-end verifiability provides election officials the ability to offer more transparency to the process of vote tabulation. ElectionGuard is open-source software created by Microsoft, free of charge, as part of the company’s Defending Democracy Program.
- iv. Hart InterCivic, Inc. has its domestic registration at 15500 Wells Port Drive, Austin, Texas, registered through Cogency Global, Inc. on June 13, 1986 with Holly Osborn as CFO and Amp; Treasurer and Julie Mathis as CEO, Pres. and Amp; Secretary with a Post Office Box 80649, Austin, Texas. The secondary company, Hart InterCivic, Inc. registered in Michigan, Foreign, registered by Cogency Global, Inc. on June 12, 2017, mailing address 15500 Wells Port Drive, Austin, Texas; a foreign enterprise. The oldest registration of Hart InterCivic appearing among the States is Austin, Texas as a domestic entity, other active registrant states: Michigan, Minnesota, Washington, Oklahoma, South Carolina, Pennsylvania, Ohio, North Dakota, New York, Oregon, Kansas, Maryland, Idaho, Wyoming and Indiana are all foreign entity filings. Plaintiff attaches EXHIBIT 4, the HART INTERCIVIC business registration record which provides the inclusive States of operation.

45. ES&S VOTER REGISTRATION, LLC.

- v. E S & S Voter Registration LLC, registered on May 1, 2003 by the National Registered Agents, Inc., 4400 Easton Commons Way, Ste. 125, Columbus, Ohio. Company contacts include Thomas F. O'Brien, registered as a foreign enterprise. Of the registrant states including Alabama, Nevada (revoked November 1, 2023), Idaho, Nebraska, Ohio, Tennessee, Texas; all foreign registrations. Plaintiff attaches EXHIBIT 5, the ES&S business registration record which provides the inclusive States of operation.

46. DOMINION VOTING SYSTEMS, INC.

- vi. Dominion Voting Systems, Inc. registered through the National Corporate Research, Ltd. with a principal address of 1201 18<sup>th</sup> Street, Denver, Colorado and a mailing address of 122 East 42<sup>nd</sup> Street, 18<sup>th</sup> Floor, New York New York. John Poulos serving as the Chief Executive Officer of the foreign New York registered corporation. Of the registrant States including Missouri, Louisiana (undisclosed), Pennsylvania, Virginia, New Jersey, Nevada, Washington, Oregon, Utah, Michigan, Tennessee, Texas, New Mexico, Mississippi (undisclosed), Oklahoma, Ohio, Colorado (undisclosed), New York (primary), Puerto Rico, all are foreign enterprises.
- vii. In analyzing the mailing address of 1201 18th Street, Suite 210, Denver, Colorado, Plaintiff located People's Wireless, Inc., the disclosure mirrors other entities within the repository, closely associated with undesirable and

unethical business practices, specifically trafficking. Further information will be sought in discovery. Plaintiff attaches EXHIBIT 6, the Dominion Voting Systems business registration record which provides the inclusive States of operation.

47. RUNBECK ELECTION SERVICES. Runbeck provides the technology to streamline the process and identify ballot envelopes, increasing efficiency and security of elections. In 2022, Runbeck introduced the Agilis Falcon, capable of processing up to 4,500 mail ballots/hr., scans mail-in ballot envelopes to detect thin/thickness to verify content correctness, scan and extracts signature images from the ballot envelope for digital comparison and verification by election officials, eliminating the movement of ballots, human touchpoints, so all non-tabulated ballots remain in a secure location during sorting and signature verification, configurable to county specifications with full reporting and audit capabilities. The pilot was launched in Lehigh, Pennsylvania (2022). Plaintiff analyzed the companies and manufacturers associated with the election equipment, following strict parameters and open-source records, as below.

- i. Runbeck Election Services. Owned by Kevin Runbeck, Arizona.  
 Patent holder: Application: 20190311030; U.S. Patent application: April 5, 2019; received October 10, 2019. Ballot Duplication System and Methods Thereof; Application: 11450167; U.S. Patent Application: September 20, 2022; received April 20, 2021; Computer-implemented system for image processing of documents associated with elections and methods thereof. Application: 11004291; U.S. Patent Application: April 5, 2019; received May

11, 2021; Method of Operating an Election Ballot Printing System.

Application: 20110122444; February 4, 2011; received May 26,

2011; Method of Operating An Election Ballot Printing System.

Application: 20110125557; February 4, 2011; received May 26,

2011; Acceptance Tray for an Election Ballot Printing Systems.

Application 20080237342; March 25, 2008; received October 2,

2008; Method of Operating an Election Ballot Printing System.

Application 20080239331; March 25, 2008; Received October 2,

2008; Feed Tray Extension for an Election Ballot Printing System.

Application: March 25, 2008; Received October 2, 2008. Kevin

Runbeck donor record reflects a history of “ActBlue” and “Stop

Republicans” donations, history dates back to 2020 – 2022.

- ii. Analyzed Agilis Systems, LLC. with 6-business; CA (pending termination); DE (unknown status); IL (active/unknown if domestic/foreign); SC (active/foreign); MO (withdrawn/foreign).
- iii. Agilis Systems, LLC – registered in DE, filing in IL, filed February 5, 2015. Outsourced registrant (National Corp. Research). Business Mailing Address: 16253 Swingley Ridge Road, #210, Chesterfield, MO 63017-1799. Officers: Gilead Group, LLC at 12444 Powercourt Drive, Ste. 375, St. Louis, MO 63131; Kent Kalkwarf, Member at 12444 Powercourt Drive, Ste. 375, St. Louis, MO 63131. Completed open-source background verification.

- iv. Kent Kalkwarf – 4<sup>th</sup> former executive of Charter Communications, controlled by Microsoft, co-founder Paul Allen to admit deceptive practice and fraud. Charter overstated revenue and cash flow by \$17m for 2000. Kalkwarf also founded the Gilead Group, Gilead Fleet, Customer Choice, C4 Connections, and Realtime Results; serving on the Board of Directors of the inclusive companies. Was with Arthur Anderson & Co. 1961 assisted with financial build out for Telcom Communications. Formed Cencom Cable Associated in 1987, serving as CEO. Sold Cencom to Hallmark in 1991. Formed Charter Communications in 1993 with Jerry Kent. Later formed Cequel III and AAT Communications – cell tower company; sold (2006). Cequel III managed Suddenlink Communications, cable services; sold to Altice Group (2015) for \$9.1 Billion.
- v. Charter Communication partner was Paul Allen who co-founded Microsoft.

48. Plaintiff states that the ballot sorting Runbeck and software is Agilis Falcon, below is the analysis of Agilis. Plaintiff attached full analysis. The findings confirm that the software run on the Runbeck system is foreign owned with extremely questionable chain of custody in ownership.

- i. Multiple Agilis entities with varied degrees of name alternations. Agilis Measurement Systems, Inc.; Agilis Commerce (Jay Bhatia – BASF and Shell association with Apollo); Agilis Management.



DH Capital advises Agilis Systems on growth investment (2019, NY).

- ii. Agilis Systems, telematics and tracking solutions announced significant investment from Spectrum Equity (Drew Reynolds).
- iii. April, 2021, Agilis Systems changed its name to Linxup – GPS solutions through software-as-a-service (SaaS). Address match to the primary Agilis Falcon used by Runbeck for the sovereign elections in the United States; Chesterfield, MO. Primary contacts under Linxup: Naeem Bari and Paul Inman. MO address remains domestic. Kent Kalkwarf was the registrant agent. March 11, 2013. Changed name to Linxup, registered in NV as foreign; address: 321 W. Winnie Lane #104, Carson City, NV 89703.
- iv. Board of Directors – Naeem Bari, President and CTO of Agilis and the CPO of Linxup and VP of Cequel III. Cequel III ties back to Kevin Kalkwarf at Gilead.

49. Plaintiff analyzed the End-to-End Verifiable Voting (“E2EVV”) technology associated with the critical infrastructure, allowing the voter to verify their ballot was properly recorded, presented by Mitre, the National Election Security Lab at the Center for Securing the Homeland, in partnership with Microsoft Democracy Forward team, Hart InterCivic, and Enhanced Voting.

- i. The technology was first offered in November, 2022, the pilot used by Franklin County, Idaho.

- ii. The Board of Trustees includes Rodney Earl Slater having an appreciative political career which includes serving as the United States Secretary of Transportation (1997 – 2001) an appointment by Defendant, WILLIAM J. CLINTON; Administrator of Federal Highway Administration (1993 – 1997) as well as a variety of positions under the Defendant while in State government, including as Assistant to the Governor, (1983 – 1987) and a member of the Arkansas State Highway Commission between 1987 and 1993. He has also served as a Board member for Verizon, of Trustee for United Way, Board member for Northwest Airlines and Delta, following their merger in 2009.
- iii. Susan M. Gordon serves on the Board of Trustees, formerly serving as Principal Deputy Director of National Intelligence (2017 – 2019), appointed by Donald J. Trump, formerly as Deputy Director of the National Geospatial-Intelligence Agency (2015 – 2017), appointed by Defendant, BARACK HUSSEIN OBAMA. Prior to these positions, Gordon was an analyst in the Office of Scientific and Weapons Research, Directorate of Intelligence at the CIA, moving through various capacities from 1980 until being appointed as Deputy Director for Support at the CIA prior to assuming Deputy Directorship of the NGA. She has served as a consultant to Microsoft among a variety of Board positions.

- iv. MITRE serves were engaged by Brad Raffensberger following the 2020 election to analyze the election results, Plaintiff has not read the report at the time of this writing. Plaintiff asserts a clear bias and disenfranchisement of Plaintiff's sovereign Right, election interference as well her Civil Rights, the MITRE organization consulted mirrors the actions taken to ensure the specific consultant of choice in the alleged cyberbreach, CrowdStrike, a consultant of choice with a foregone conclusion, a self-fulfilling prophesy; these actions are incongruent with investigative integrity in protection of the People's most sacred of Rights.

50. Plaintiff analyzed the background of Josh Benaloh, Senior Cryptographer with Microsoft. Benaloh developed the Risk Limit Audit as well as the current program running concurrent with the 2024 election, ElectionGuard. In 2016, Benaloh co-authored a paper entitled, "Keys Under Doormats: Mandating Insecurity by Requiring Government Access to all Data and Communications, (See: <https://dspace.mit.edu/bitstream/handle/1721.1/97690/MIT-CSAIL-TR-2015-026.pdf>), excerpt below:

The long running policy debate over encryption...actually began in the 1980's with conflicts over whether computer companies such as IBM and Digital Equipment Corporation could export hardware and software with strong encryption, and over whether academics could publish cryptographic freely...The question came into full force during the 1990's, when the United States government, largely through the use of export controls, sought to prevent companies such as Microsoft and Netscape from using strong cryptography in web browsers and other software that was at the heart of the growing Internet. The end of the wars – or the apparent end – came because of the Internet boom...the real security challenge is not the mathematics of cryposystems; it is engineering, specifically the design and implementation of complex software systems which include security features. Two large government efforts, healthcare.gov and the FBI Trilogy program, demonstrate the difficulties that scale and system integration pose in building large software systems...the president's signature healthcare program failed badly in its initial days...a decade earlier, five years of effort spent building an

electronic case file systems for the FBI – an effort that cost US \$170m was abandoned as unworkable.

- i. Benaloh’s working theory holds that local law enforcement may lack the analytical skills necessary to assess requirements necessary to know with certainty of a cyberbreach. He offers questions for contemplation of his theory as well as build-out of a prudent planning and design model for potential adaptation; the complexity of cyberspace and cryptography does not appear to be overcome through the aid of the queries. As his theory cannot find resolve, he defers to the capitalist model; financial benefit derived through the compensation of governmental contracts at taxpayer expense.

51. Clint Watts – former FBI and lecturer. Mr. Watts presented at the 2020 NASS with a primary focus on the fabricated Russia interference claims. (*See* ECF Doc. 1; 45-22). Mr. Watts also serves on the Board of the German Marshall Fund, a 501c3 founded by Guido Goldman with an endowment from the former Chancellor of West German, Willy Brandt. The program manages Hamilton 2.0 Dashboard for the U.S. Climate Alliance (“USCA”); behind it’s shell entity, the group tracks private citizens who purchase electric cars, Governors from 22-States are members of the organization and receive data updates from the staff as USCA tracks purchasers of electric cars, garnered from vehicle registration data to track vehicle emissions; Plaintiff asserts clear violations of First Amendment Rights, tracking private information absent a warrant or consent with the data shared without restraint. Mr. Watts was an instrument for the FBI in the early phase of COVID-19, meeting with the NASS, the presentation transcript depicts a Operation Mockingbird 2.0 a psychological manipulation, exploring everything from Russia to Google algorithms to nuclear disaster. On May 16, 2023, Mr. Watts was appointed to

Microsoft's Threat Analysis Center as General Manager, responding to cyber threats, evidencing the posture of Microsoft, most certainly not unbiased, nor of the Plaintiff's sovereign interests'.

### **INJURY STATEMENT**

52. Plaintiff will suffer irreparable injury if this Court does not provide injunctive relief, voting rights “are threatened or impaired, irreparable injury is presumed.” *Obama for Am. v. Husted*, 697 F.3d 423, 436 (6<sup>th</sup> Cir. 2012); *see also League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4<sup>th</sup> Cir. 2014) (“Courts routinely deem restrictions on fundamental voting rights irreparable injury”); *see also id.* (“[O]nce the election occurs, there can be no do-over and no redress.”); *Democratic Nat’l Comm. v. Republican Nat’l Comm.*, No. CV 81-03876, 2016 WL 6584915, at \*17 (D.N.J. Nov. 5, 2016) (“[C]ourts have consistently found that a ‘person who is denied the right to vote suffers irreparable injury’” because “infringement on the right to vote ‘cannot be alleviated after the election.’”)

### **MICROSOFT – UNITED STATES ELECTIONS**

53. Plaintiff states that on April 15, 2024, Microsoft contracted by way of “strategic investment” with G42, a wholly-government owned enterprise of and belonging to the United Arab Emirates (“UAE”), establishing a fund of \$1.5 Billion to partner in an Intergovernmental Assurance Agreement, a collaboration bringing the latest Microsoft AI technologies and skilling initiatives to the UAE and other countries around the world. Through the collaboration, G42 will run its AI applications and services on Microsoft Azure, harnessing the power of Cloud and AI, empowering countries and markets to advance their digital agendas. Plaintiff states that her sovereign vote, protected as critical infrastructure, is cast, scanned and counted, on the Microsoft Azure system.

54. Plaintiff states:

- i. In accordance with the DHS protocol under the National Protection and Programs Directorate, Defendant AJEXANDRO MAYORKAS would have been made aware that the primary contractor responsible for the United States elections had contracted to share space on the very same platform with a foreign nation-state.
- ii. In September, 2023, Defendant, JOSEPH R. BIDEN issued an order telling Cfius to “pay close attention to deals involving critical technologies, including artificial intelligence, quantum computing and biotechnology. While the order did not name China, the industries are frequently mentioned by US intelligence agencies as ones where China is trying to obtain US technology.”<sup>14</sup>
- iii. On September 8, 2022, the FBI, Defendants in this matter, declassified an investigation, see EXHIBIT 3 reference 194B-DL-2591597 Serial 76. The investigation states that Crow Holdings purchased land in Frisco, Texas for a new business park (August 31, 2021) in the company of Middle Eastern Investor. Also in August, Crow Holdings formed a partnership with Abu Shabi-based Mubadala Investment Co. to build almost \$1 billion in industrial projects in the United States...Mubadala Investment is a sovereign investor managing a \$243.4 billion global portfolio, wholly owned entity of the UAE, government enterprise.

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<sup>14</sup> Massoudi, Arash, Secastopulo, Demetri. US Security Officials Scrutinize Abu Dhabi’s \$3bn Fortress takeover. July 25, 2023. Accessed April 10, 2024 <https://www.ft.com/content/a8f3b524-ff45-4935-96da-cc-08bd32e138>

- iv. On October 20, 2021, the DOJ, Defendants in this matter, announced an unprecedented resolution of criminal charges against three former U.S. military and intelligence members for conspiring to conduct computer network exploitation operations (hacking) on behalf of a foreign government, the UAE.

55. Plaintiff states that the federal departments and Branches, inclusive, each had individual areas of intelligence concerning the UAE, actions operating under various names, as to the foregoing actions; under the Patriot Act and the structured changes made within the intelligence community following the heinous events of September 11, 2001, this NATSEC intelligence would have gone through channels within DHS, DOJ, NSA, CIA, FBI and Executive Branch, at the very least. There was no action taken to impede the consummation of contractual relationship, no skidmarks within the crime scene, the brakes not applied, this, despite the constraints and Constitutional violations for which Plaintiff sacrificed under the auspices and premise of Homeland Security, the harms are beyond measure given her academic acumen and knowledge. The blatant disdain for God and Country by the inclusive Defendants is palatable.

56. Citing the historic record of longevity in and among the philanthropic and multinational corporations, Plaintiff analyzed the Microsoft Board of Directors (2012), the same time period in which William H. Gates, III remained as Chairman of the Board. The findings as follows:

- i. William H. Gates, III – Microsoft Corporation,  
Chairman/CEO/President and Chief Software Architect until 2014.  
Transitioned to part-time in 2000 at MS and full-time at Bill and Melinda Gates Foundation; stepping down as Chairman in

February, 2014 and remaining technical advisor to support newly appointed CEO Satya Nadella (Present CEO). Left Board of MS and Berkshire Hathaway (2020).

- ii. Steven A. Ballmer – Microsoft Corporation.
- iii. Dina Dublon – JP Morgan Chase.
- iv. Raymond V. Gilmartin – Merck & Co., Inc.
- v. W. Reed Hastings – Netflix, Inc.
- vi. Maria M. Klawe – Harvey Mudd College.
- vii. Stephen J. Lusczo – Seagate Technology, PLC.
- viii. David F. Marquardt – August Capital.
- ix. Charles H. Noski – Bank of America Corporation.
- x. Helmut G. W. Panke – BMW AG.
- xi. John W. Thompson – Virtual Instruments.

57. Plaintiff holds to a strict code of conduct and ethics, a deeply committed Christian who has lived her entire adult life studying theology in conjunction with criminal justice, public policy and Middle Eastern studies, applying these beliefs in every facet and human interactive. Plaintiff has a comprehensive knowledge beyond mere contracts between Microsoft and the United States as well Microsoft and the UAE. Plaintiff states that the collective Defendants have subverted these United States, consistent with levying war and, that within the context of their assemblage is the disclosure to the Plaintiff of the unspoken, the war against Christianity. As Plaintiff extols her humanness as unalienable from her Rights, informed by her Creator, God, so too does she ascertain the levity of the inclusive Defendants' schemes against her, schooled in the Bible, the Torah, the Koran and every dark book known to humanism.



58. Plaintiff states that these treasonous acts of subversion, a wholly seditious trespass, are the driving force behind every precept, concept and contrivance of jurisprudence levied against Donald John Trump, reaching back as far as his announcement to run for the highest office of these United States with the Defendant, BARACK HUSSEIN OBAMA, wiring Donald John Trump's offices. The vehemence of the Defendants' collectiveness to repeat the blatant fabrication of claims, including contorting the law to meet the ends of the treasonable design formed in and among the Defendants' coven assemblage affirms Donald John Trump too stand in the path as gatekeeper to ensure these pursuits are unsuccessful; a Created being, unalienable from his Rights.

59. These telling actions by the inclusive Defendants, unwarranted as unlawful, affirm the common moral and religious tenons which will serve in retention of this land, a dominion and gift entrusted by His hand to the sovereign, Created in the collective, as one to the other.

60. Plaintiff states that the base for law is not divided, and no one has the right to place anything, including king, state or church, above the content of God's Law, the Founders understood the concept well; the authority of that which was scribed; the Constitution, founding documents and body of jurisprudence precedent, is rooted back to Him who is the final reality; neither church nor state are equal to, let alone above, that Law.

61. Plaintiff states that the inclusive Defendants' actions are unconscionable, exceeding the terrorist acts for which the UAE is directly associated, made unconscionable as the parties to the deed, the inclusive Defendants, allege to be citizens and countrymen of these United States. The facts prove them as conspirators who have murdered senior citizens and the infirm; held hostage their citizens, in many cases without disclosing the charges associated with

detainment, an unconstitutional continuum of harm; who empowers known terrorists while disavowing allies; who leaves its citizenry vulnerable to unvetted, unlawfully traversing persons of unknown origin at our border while knowingly subverting the protected election infrastructure, inviting foreign nations into our elections from every facet that a sovereign's ballot might touch. The foregoing actions, evidenced as true and factual, affirm the levying of war, silent as it may be but no less.

62. Plaintiff states that the inclusive Defendants have given aid to a trespass on the most sacred of all tangible and coveted of assets belonging to her, the liberty of being free, an American living under the Constitution, holding to distinct concepts apart from those of other nation-states, for the Plaintiff these are foremost concepts of Civil Rights. Plaintiff states that her family has a long history, dating back to shared company with Abraham Lincoln and George Washington, toiling to ensure that these United States remain sovereign, standing resolute against tyranny from within as well in military uniform on foreign soil to ensure sovereign retention for others.

63. “When we saw the Russians attacking democracy and trying to influence elections around the work, not just the United States, we concluded this was a step we needed to take.” This statement was taken from the Microsoft training material provided to stakeholders including county, state and municipal parties working within the elections. The statement provides no indication that the claims of election interference were false, proven so through a vast number of investigative events, now a matter of federal record. Moreover, by retaining the statement in printed election training content, by a federal contractor having secured funds to ensure that the unalienable Rights of the voters are counted, the decision to retain the statement serves to undermine the election process, disenfranchising the subject candidate while severing

trust in and among those working in the election process. Plaintiff states that retention of the statement achieves one predetermined outcome, instilling fear fueled by the unknown, cyber related criminal activity, while simultaneously carving out an area within the election process, non-existent under the Constitution, therefore unlawful; a seat within local elections where federal entities are requested and only too happy to oblige.

- i. Plaintiff reviewed the advisers, those who work within the substructure advising Microsoft in the development of protocol while sharing ethos, aiding in the development of policy and protocol. These include VotingWorks, BPro/KNOWInk, TotalVote, and Democracy Forward.
- ii. VotingWorks. Plaintiff states that VotingWorks has no business being involved in sovereign elections. Their bias and partisan posture is blatant, making them unable to evaluate complex challenges in the creation of election training benchmarks, expressed through protocols while interfacing directly with stakeholders including state, county, local and tribal election workers.
- iii. VotingWorks is a 501c3, mentored by the Center for Democracy and Technology in 2018 as a start-up. The founders include Ben Adida, a cryptologist trained at MIT, a member of the Creative Commons, a Technology Advisory Board and of the Center for Strategic and International Studies Authentication Workgroup. According to the VotingWorks website, the business model is built

on balancing the interests of business and free software, while strengthening privacy in the context of the war of terror. John Lilly, former CEO of Creative Commons, is a venture capitalist who formerly worked for Mozilla with a specialty in non-profit operations and governance, especially around the creation of open-source based movements and Code for America. Ryan Merkley former Executive Director of Wikimedia Foundation, former CEO of Creative Commons, an advocate for open licenses, net neutrality, and open data initiatives in the public sector.

- iv. Plaintiff states that VotingWorks has no working knowledge of elections.

68. Plaintiff states that Defendant, WILLIAM J. CLINTON as well as Jeffrey Epstein shared a close association with MIT, including donor capacity and sourcing project funders, equity partners who fund academic pursuits while employing the projects as investment vehicles to build wealth portfolios at the expense of the Plaintiff's Constitutional Right to her sovereign vote.

- v. BPro/KNOWInk: BPro was founded in 1985 by Sandra Bowers, selling to Brandon and Abbey Campea in 2009, in Washington State. BPro merged with KNOWInk in 2020, their software at that time was being utilized within fifteen (15) States. The company has a historic record of direct campaign contributions to candidates, financing expensive social outings with corporate representatives, fiscal mismanagement including missing

electronic records, and misappropriation of funds. Similar to Plaintiff analysis of printing companies, subject of the amended complaint (See ECF 45), there is a history of contracts being awarded absent competitive bidding as a standard of practice from the time of their inception to the present day, a statutory and HAVA regulated election guardrail which Governors and Election Superintendents have avoided, knowingly. BPro contracts with foreign software developers who, in turn, accept advertising to defray costs while embedding the election software with rolling advertising, viewable by the public when voting. The preexisting contractual relationship between BPro and the advertiser will not permit a change in the contract terms. BPro allows for subcontractors who have been successful in protecting their interest under the 10th Amendment, contracting directly with the Elections Superintendent at the State level and bypassing County officials where the 10th Amendment interest would not hold. Ex. AVID Access Voter Information Database, Arizona and Sutherland Government Solutions, a subsidiary of Sutherland Global Solutions who partnered with AVID in AZ. Sutherland is a digital analytics company applying algorithms for problem solving (AI, cognitive technology, and automation).

- vi. TotalVote. The company was formed in 2007, initially as an election night reporting system called the Central Election

Reporting Systems (CERS), it has evolved with the adaptation of BPro add-on which TotalVote purchased with the use of public funds. BPro retains autonomy while sharing an operational relationship of KNOWink, as above. TotalVote is the primary contract and income stream for BPro, acting as a pass-through for TotalVote by offering turnkey remote software access for everything with the exception of a paper ballot scanner.

- vii. Democracy Forward. The non-profit was formed by Marc Elias, formerly of Perkins Coie, presently an attorney with Elias Law Group who has a long history of representing the interest of the Democratic Party. In 2023, it was reported that Elias was parting ways with the DNC; however, by all appearances including his direct involvement in the election process by way of Microsoft, he has found a new venue for his bias. Mr. Elias is on the record in December, 2022, “I don’t want to leave the Republican Party unattended...I want to babysit them in every case they file.” (Source: Politico December 21, 2022). Ron Klain, formerly served as White House Chief of Staff for Defendant, JOSEPH R. BIDEN. Javier Guzman, formerly served as Director of Global Health Policy Program and Senior Policy Fellow, nominated by Defendant, JOSEPH R. BIDEN as assistant attorney general of the DOJ Civil Division, he formerly served as deputy associate attorney general under Defendant, BARACK HUSSEIN OBAMA.

Mindy Myers is a Democrat political strategist and paid consultant, previously serving as Chief of Staff to Elizabeth Warren (D-Mass.), and managed Senator Sheldon Whitehouse's campaign in 2006.

viii. Plaintiff states, unequivocally, that the consultants to Microsoft have a clear Constitutional conflict with the administration of sovereign elections; the parties have no business being involved in the election process but for those of their affiliated political ideology. Plaintiff states that the preponderance of evidence, born of the foregoing individuals' own hands and history of work product, proves an unsurmountable burden, disqualifying them from any manner of election involvement.

64. Plaintiff states, unequivocally, that the inclusive Defendants, had full knowledge of the Microsoft build-out of known parties, biased and, as facts will disclose, compromised to foreign governments to which the inclusive Defendants aided and abetted in the multinational corporation's inculcation into critical infrastructure of these United States so as to exact a predetermined outcome.

65. After analyzing the foregoing, Plaintiff evaluated the Board of Microsoft applying identical models of open-source data.

i. **John W. Stanton** – Trilogy Partnership a private equity and Trilogy International Partners, a wireless operator in New Zealand, and Central and South America. Mr. Stanton was formerly the Chief Executive

Officer with VoiceStream Wireless, acquired by Deutsche Telekom, subsequently renamed to T-Mobile USA.

- ii. CLEARWIRE: Serving simultaneously as Director of Clearwire Corporation (2008-2013). Plaintiff states that Clearwire merged with Sprint/Nextel (2008) which was isolated to Sprint (2012). Presently serves on the Board of Directors of Costco Warehouse and First Avenue Entertainment LLLP, owners of the Seattle Mariners and Nintendo (1992, purchased from Hiroshi Yamauchi, former President, Japan); divested of large portion of Seattle Mariners ownership, Mr. Stanton retained as principal owner. Owns minority stake in ROOT Sports NW (2013) – regional sports network throughout the Pacific Northwest.
- iii. TRILOGY PARTNERSHIP: Western Wireless (2005), merged with Alltel (2005), sold off Comcel (Voila) Haiti, sold to Digicel (2012). In 2015, Trilogy Dominican Republic Operations changed name to Viva, sold to Telemicro Group. Trilogy Equity Partners – Aven Foundation Trilogy listed on the Toronto Stock Exchange, take-over of the company, listing active until 2024 when SG Enterprises II took it private, included was TIP Inc., a wireless service in New Zealand and Bolivia.
- iv. Trilogy International Partners' wireless subsidiary in Haiti (Voila) works with the International Federation of Red Cross and Red Crescent Societies (AFRC). In 2010, the foregoing entities collaborated on the first suspected cases of Cholera. On October 21, the Red Cross began sending text messages via \*733, approx. 500,000 text messages had been sent



since the epidemic outbreak was identified. The pilot program in Haiti launched Voila and Trilogy International Partners to partner with the Red Cross in deploying messaging application on wireless networks around the world, including Pakistan, following weather-related crises events.

- v. Trilogy's Viola wins Gates Foundation, USAID Award for their work in Haiti, conducting 100,000 qualifying financial transactions – sending, receiving, or storing money on their mobile phones through the banking partner, Unibank; Voila's mobile money service, T-Cash. Voila partnered with Mercy Corps to use T-Cash, Oxfam, World Vision, Help Age and Catholic Relief Services.
- vi. Defendant, HILLARY R. CLINTON, holds irrefutable attachment to the pursuits of Trilogy, and the reverse is also true. In the company of TOMS Shoes sharing a working relationship with Ambassador Vilma Martinez in children's shoe donation project (Argentina), Secretary of Commerce Gary Locke and his wife, Mona Lee, ComCel (Voia) Haiti and Ambassador Merten and Ambassador Joseph for the collaborative efforts made in Haiti.

66. Plaintiff restates the claims as set forth in the amended complaint (*See* ECF 45) made treasonous in the blatant Constitutional conflicts as the Defendant eviscerated her oath and obligation in the practice of foreign statecraft to benefit herself at the expense of human beings while manifesting benefit to an autonomous non-profit entity through which she and her family might launder their sin. The audacity of entertaining such a venue at a building of these United States under pretense and mascaraed of philanthropy that the Defendant might be

viewed than anything other than the unvarnished truth; evil, incarnate, opposes every Judeo-Christian concept of charity, a common thief of thought, mind and soul. No one is above the law Ms. Clinton.

- i. **Catherine MacGregor** – Engie, SA (LaDefense, Courbevoie HQ)  
 electricity generation and distribution, natural gas, nuclear, renewable energy and petroleum, with active upstream (engineering, purchasing, operation and maintenance) and downstream (waste management, dismantling) activities; operating in 27 Countries in Europe and 48 Countries worldwide. Merger of Gaz de France and Suez (2008).  
 Company history dates to King William I of the Netherlands, ‘Suez’ trace history to the Suez Canal; Suez S.A. merger with Compagnie de Suez and Lyonnaise des Eaux (1997). Gaz de France (1946) in the company of sister company Elecricite de France (EDF) by the Frensch Government after the liberation of Europe’s energy markets.
- ii. August 10, 2010, merger of its GDF SUEZ Energy International business unit with its operation in the U.K. and Turkey with International Power.
- iii. December, 2010, GDF SUEZ became member of Medgrid Company (consortium of twenty plus utility, grid operators, equipment makers, financing institutions and investors – implemented the Medgrid Project – French renewable energy initiatives framework for the Union of the Mediterranean electricity network move to 5G, project partnered with Germany (Desertec Project).

- iv. April 25, 2015 – changed name to Engie Energy International. July, 2015, Engie acquired 95% of Solairedirect. Engie acquired Keepmoat Regeneration (2017). GDF Suez ranked among the 13<sup>th</sup> best of 92 oil, gas, and mining companies on indigenous rights and resource extraction in Arctic (North of Arctic Circle). In April, 2019, Engie Announced the acquisition of 905 of Transportadora Associada de Gas (TAG), Brazil, Brazil's largest natural gas transmission system owner.
- v. **Penny Sue Pritzker** – former Secretary of Commerce, appointed by Defendant, BARACK HUSSEIN OBAMA (2013-2017). Founder PSP Partners, PSP Capital partners. Pritzker Realty Group (Orlando, FL), Artemis Real Estate Partners and Inspired Capital. Board member – Microsoft and Carnegie Endowment for International Peace, sibling of J.B. Pritzker, Governor of Ill. Formerly involved in Chicago Board of Education and Museum of Contemporary Art, Chicago. Appointed to President's Council of Advisors on Science and Technology (2021-2022); U.S. Special Representative for Ukraine's Economic Recovery, appointments by Defendant, JOSEPH R. BIDEN. Served as Finance Chair for Defendant, BARACK HUSSEIN OBAMA (political campaign 2008 – small donors). Served as President of UNITE HERE, labor union (U.S./Canada – hotel, food, laundry, warehouse, casino industries); Board member Council on Foreign Relations and President's Council on Jobs and Competitiveness – Economic Recovery Advisory Board, appointment by Defendant, BARACK HUSSEIN OBAMA. Advisory Board member,

Aspen Institute and Harvard (Roles: Board of Overseers (2002); Harvard Corporation (2018) and University. Chair, Carnegie Endowment for International Peace (2018); Illinois COVID-19 Response Fund (March, 2020) – contributed seed funds \$23m and private contribution of \$1.5m. Bryan Traubert (sp. – ophthalmologist) – Joint private - Pritzker Traubert Foundation. Cousin (Karen Pritzker – Grameen America). Family interests: Marmon Group – Holding Co., held by Berkshire Hathaway (sold 63.6% 2008) – through put company which manuf. Transportation equipment – Tank Rail.

- vi. **Jay Pritzker** (Uncle) – conglomerate organizer. Acquired Ticketmaster (1982) expanded and sold at 80%+ to Microsoft co-founder Paul Allen (1993). Braniff Airlines (1983-1990) – Dallas and Orlando.
- vii. **Hugh Johnston** – Walt Disney Company, an organization known in the public sphere for human trafficking and psychological trauma/manipulation of child actors, grooming them for advancement. The safe harbor of endearing costumes and bobbysocks with mouse-ear hats has come to an end.
- viii. **Mark Mason** - Citi also unequivocally attached to Grameen.
- ix. **Carlos Rodriguez** - ADP, Inc., Company run by NJ Sen. Frank Lautenberg who acquired Cyphernetics (commercial timeshare company) in 1975 (MI), the company was run from a sales office centrally located in major city hubs while providing concierge services, communication and technical support to clients. Through a series of acquisitions, the company

built a reputation in Europe, purchasing Autonom (Germany), GSI (Paris) and Chessington computer Center (UK). The company consummated with the BCCI model as it tethered to Richard J. Daley, former Mayor of Chicago, CEO of Broadridge Financial Solutions, entering the securities market and was in 2007, spun off. Thereafter, in 2017, ADP acquired the Marcus Buckingham Company (UK) and Global Cash Card, a digital payment facilitator. In 2018, ADP acquired WorkMarket, a software platform to aid businesses in managing freelance, contractors and consultants, followed by Celergo, a global payroll management service company. In 2023, ADP acquired Honu HR, Inc. (Sora), an AI reading facilitation app.

- x. **Charles W. Scharf** - Wells Fargo also unequivocally attached to Grameen.
- xi. **Satya Nadella** – Nadella has forged a reputation for Microsoft with an emphasis of working with companies and technologies, including competitors Apple, Salesforce, IBM, and Dropbox– finding comfort with a common goal, humanistic at its core, a collector of corporation bringing them into the fold of multinational advancement at the expense of sovereign identity and nation-state.
- xii. **Emma Walmsley** – British multinational pharmaceutical and biotechnology company – CEO, GSK Consumer Healthcare (Haleon) 2022 launch; integrating existing product pipelines from Novartis and Pfizer as a stand-alone enterprise, generating £10 billion.

65. Plaintiff audited the 2012 MS Board records, citing the longevity of history to affiliated organizations as well the complex fraudulent actions of multinational, including BCCI, Marc Rich, etc., findings as below:

## **CYBERSECURITY**

66. The federal cybersecurity statute enacted, mirror policy dictums ratified following the tragic events of September 11, 2001, designed to engage federal, state and local authorities with a cross-pollination of training, reporting and parallel communication; in this case with provisional security clearances exacted to ensure protection of the subject critical infrastructure dialogue is fluid throughout the stakeholders at the federal, state, county and local venues. Designed by DHS as a best practice model in the interest of protecting the Right to sovereign self-determination, expressed vote, manifest in the seminal passage; “We hold these truths to be self-evident.”

67. Plaintiff states that DHS crafted policy, seemingly intent on protecting the sovereign Right to vote from interference built on the premise of the concocted cover story of Russian election interference that was alleged to have taken place in 2016, the policy was reinforced by Executive Memorandum of July 28, 2021, as set forth above. In the intervening period, the Defendants built back better scaffolding to effectuate the very claims that were promulgated upon the Plaintiff in 2016 as presented herein.

68. Plaintiff states that the analysis proves a direct correlation between the time that the Awan Brothers were given carte blanche access to House IT department, including but not limited to family members in Pakistan by thumb drive exchange, from at least 2006 – 2017, access granted by the inclusive Defendants to exact malfunction and dysfunction resulting in economic insecurity within these United States.

69. Plaintiff states that the elections within the United States are contracted, paid for with taxpayer funds of and belonging to the Plaintiff, collected in good faith of use to the benefit of the broader County, the United States, as needs are met domestically, aiding other nation-states, in the advancement of the common good of all. As the facts present, the findings indisputable, the inclusive Defendants have consummated their contract with Microsoft, among others, in knowing manner to facilitate a fraudulent act, intent to fracture the bedrock of these United States, shattering public trust altogether, impugning the Plaintiff's unalienable Rights, a Right so sacred and coveted that others would flee their homes with nothing more than the clothes they wear, as Plaintiff's grandparents did.

70. Plaintiff states, unequivocally, that the inclusive Defendants breached National Security on multiple occasions to carry out their scheme, aiding and abetting foreign persons, ensure that the foreign parties have unfettered access to the United States governmental electronic records, having absolutely no regard for Plaintiff's Rights whatever, while enforcing every facet of control derived by statute, power and might to retain control until their toil has met its ends. The inclusive Defendants have subjected the Plaintiff to deprivation of her most foundational protected Rights, Liberty, itself; that very essence that a free people understand esoterically but few can define; it is the unbridled spirit to stand in defiance of fear that with God's grace and providence, unblemished by the trespass, Liberty will live forward.

71. Plaintiff affirms that she has worked in and among every State in the Nation from 2020 – 2023, the data is indisputable; every single State has over registration which spikes in advance of presidential elections, regardless of outsourcing registrant management or purging of voter registration record. The appearance of these spikes correlate directly with the same period in which the Awan Brothers were given permission to freely meander the NATSEC of this Nation

by the DNC and the Democratic Caucus, inclusive. Plaintiff states that the abundance of registrants with birthdates that exceed eldest resident records is consistent in each and every State.

72. Plaintiff states that the Awan Brothers investigation was knowingly compromised, leveraging the DOJ, FBI, Capitol Police and Judiciary contorting the law to exact minimal punitive action to benefit the perpetrators of criminal behavior, not of misrepresenting facts on loan documents but of national security theft; espionage, with the consent and assistance of the inclusive Defendants.

73. To establish this Contract, citing the Critical Infrastructure Subsector, the imminent threat of foreign election interference would rightly have engaged the Election Infrastructure Subsection Specific Plan, (“Plan”) established in 2022, Plaintiff states that the engagement did not happen because the action by Microsoft was covertly forecasted, a link in a chain sequence of events. Rightly, in accordance with the Plan, the Defendant, ALEXANDRO MAYORKAS as the Secretary of Homeland Security would have been contacted, followed by Defendant, MERRICK GARLAND as Attorney General, thereafter the Government Coordinating Council (“GCC”), Cybersecurity and Infrastructure Security Agency (“CISA”) and, the Election Assistance Commission (“EAC”), and the National Secretaries of State (“NASS”), the National Association of State Election Directors (“NASED”); the Plan was not enacted, the risk assessment events did not happen and the danger remains unassessed at the time of this writing; they did not happen because the contract was known by the Defendants. As a consequence of the Defendants’ ineptness, Plaintiff’s faith in the Defendants’ non-existent, presently absolute in its destruction.

## **ECONOMIC WARFARE**

74. On December 22, 2022, the United States government awarded contracts for cybersecurity to multiple firms. To award these contracts, the contractors are required to go



through a stringent application process with federal governmental departments reviewing same. the Plaintiff analyzed the individual companies receiving awards, as outlined below, a sample with the remainder detailed in harms section.

- i. Five Stones Research (5SRC). Described as a small business-based firm in Alabama received a \$266m contract to help the Missile Defense Agency identify and mitigate cybersecurity risks in weapon systems, also tasked with helping the Pentagon protect its networks securing cloud-based information systems, evaluation proposed IT solutions, and identifying vulnerabilities and threats. Five Stones Research is a foreign entity with shell companies designed as pass throughs, exactly the same mapping as BCCI.
- ii. General Dynamics Information Technology (GDIT). Announced a \$267m cyber contract with one-year base and a three-year option with the Army National Guard. In addition to cybersecurity, the Guard Enterprise Cyber Operations Support (GECOS) contract covers IT infrastructure, application hosting, and associated services. General Dynamics is a foreign enterprise, exactly the same mapping as BCCI.
- iii. Booz Allen Hamilton. Secured a \$622m contract to provide a complete range of cybersecurity and privacy enterprise solutions and services to NASA. The Cybersecurity and Privacy Enterprise Solutions and Services (CyPRESS) contract runs until September, 2023, with four option periods running through September 2030. The company also won a \$99m cybersecurity contract for two U.S. Navy organizations. Booz Allen

Hamilton has locations in Baton Rouge, LA; McLean, VA; Wilmington, DE (Corp. filing); Juneau, AK; Indianapolis, IN; St. Louis, MO; Madison, WI; Augusta, ME; Jeffersonville, VT; Bismarck, ND; Boise, ID – of these addressed, Alaska and Louisiana are undisclosed with the remainder Foreign enterprises.

75. Plaintiff draws from the well of dereliction, overflowing with evidentiary statements made by the inclusive Defendants; in the cases involving Apple iPhone hacking and the NSO Group opined by Defendant, CHRISTOPHER WRAY. The Defendant went out of his way to ensure the statement was made regarding the FBI not conducting business with foreign enterprise when, in fact, that is precisely what has been transpiring.

76. Plaintiff states the unequivocal harm in the actions by the inclusive Defendants in their actions to remove her from holding office, her Oath viewed with honor and dignity, stolen from her and the community which she serves as well the many civic commitments which she endeavored. Running concurrent with the manufactured Russian interference investigations, William Browder continued his corrupt business practices under auspice of the Hermitage Fund in partnership with Republic National Bank which provided the initial seed money for Browder's enterprise, the facts succinctly captured in the Court record (*See* ECF Doc. 43). Plaintiff states that after Browder has successfully laundered funds through Republican National Bank, a classic pump and dump, Defendant, GEORGE NORCROSS was in the process of purchasing the ailing institution; those negotiations were terminated following Plaintiff entering the pleading.

**A PRELIMINARY INJUNCTION WILL SERVE THE PUBLIC INTEREST.**

77. Finally, a preliminary injunction will serve the public interest. "The public has an interest in ensuring federal laws are followed, particularly when those interests relate to voting

rights.” *League of Women Voters of Mo. V. Ashcroft*, 336 F. Supp. 3d 998, 1006 (W.D. Mo. 2018). By contrast, “[t]he public has no interest in enforcing unconstitutional laws.” *Firearms Policy Coal. Second Amend. Def. Comm. v. Harris*, 192 F. Supp. 3d 1120, 1129 (E.D. Cal. 2016). The public interest in compliance with the Constitution regarding these fundamental Rights, scribed by our Founders and held in the hearts of those who hold allegiance to this fine Nation weighs strongly in favor of preliminary relief here.

78. Plaintiff states that the inclusive Defendants have consummated a contract with Plaintiff’s taxpayer funds, attaching her sovereign voice to a knowingly compromised voting structure which they will precertify with full knowledge of the magnitude of their action; they are fully prepared to do so. Plaintiff is not and will not; the facts fully inform of the inclusive Defendants’ actions, an overt violation of the utmost Law, that of the promise made to our forefathers and to those coming up.

79. Plaintiff states, unequivocally, that the election cannot be conducted by machine scanning or counting with every link in the sequence compromised to foreign entities, merely holding to United States mailing addresses, the foreign affiliates remaining undisclosed. Unlike the unfounded claims presented by the body of Defendants throughout recent history, “utterly lacking in support” (See *Galin v. Hamada*, 283 F. Supp. 3d 189 at 203 (citation omitted), Plaintiff is fully confident that discovery will be fruitful as in *Galin*, which yielded “myriad evidence.” The inclusive Defendants, , have declared a silent war against the Nation of the United States, employing an undercurrent of trickery and deceit exceeding the thresholds of consciousness, wholly unacceptable, unlawful and causational of acute, particularized injury of the most sacred Rights, her right to sovereign vote and unimpeded choice of candidate.

80. Plaintiff states that the inclusive Defendants, have violated the critical infrastructure of the United States as set forth in the National Security Memorandum on Improving Cybersecurity for Critical Infrastructure Control Systems, dated July 28, 2021, and insodoing, have knowingly infringed on the Civil Rights of the Plaintiff in her pursuit of Life, Liberty and Property.

81. Plaintiff trained individuals across these United States regarding the Center for Tech and Civic Life (“CTCL”), the methodology applied regarding the aging election infrastructure coming to full technicolor as Plaintiff’s autonomous research is cross-pollinated with names, events, and timelines. Plaintiff reiterates the claims of harm in the loss of her sibling, the Governors and their peers sacrificed the innocent to meet their Plan, feigning their care for humanity through oration while in the darkness of their depravity, their hands placed a pillow over their citizens faces, ensuring their demise – voice, vote, and body; their souls spared by God, Almighty.

82. Plaintiff states that the events which took place leading up to and following the 2016 and 2020 elections caused by the inclusive Defendants and in the company of broadcast media, combined to permeated public trust, shattering it with malice forethought.

83. Plaintiff states that the comprehensive picture of the injury does not come into focus until and unless the truth is made known and put to action.

84. Affidavits of: Margret Carton; Wanda Opdyke; Donna Coons; Altaira D. Howanice are also attached in support of this application before the Court.

### **CONCLUSION**

Plaintiff respectfully requests this Honorable Court grant its motion for preliminary injunction.

### **CERTIFICATION OF SERVICE**

I HEREBY CERTIFY that I filed today, Monday, May 20, 2024, the foregoing with the Federal Clerk of the Court for the United States District Court, District of New Jersey, via electronic filing, which will send notification of such filing to all parties registered for this case, including the Defendant's counsel via the electronic filing system.

/s/ Mary B. Logan  
Mary Basile Logan  
*Pro-Se* Plaintiff

**cc: All Counsel of Record (Via ECF)**